

## **EXHIBIT “A”**



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June 30, 2006

**VIA FACSIMILE & HAND DELIVERY**

Mark Gordon, Esquire  
Pietragallo, Bosick & Gordon  
One Oxford Centre, 38<sup>th</sup> Floor  
Pittsburgh, PA 15219

**Re: *Royal Insurance Company of America, et al. v. Latrobe Construction Company; Civil Action No. 00-2128; U.S.D.C., W.D. Pa.***

Dear Mr. Gordon:

On January 25, 2005, Bruce Fox wrote to you requesting information on a matter captioned *Denise Reghetti v. EBI Companies* in which a lawyer from your firm had represented Royal Insurance Company. Mr. Fox was concerned that this prior representation of Royal by your firm might have created a conflict of interest with respect to your representation of Latrobe Construction in the present litigation. In that letter, he specifically requested that you "provide any and all documents, including but not limited to, fee letters, pleadings, correspondence and billing statements regarding the *Denise Reghetti* matter, **and any other matters, in which PB&G previously represented Royal.**"

Your response to this letter, dated February 1, 2005, did not identify any other matters in which you or other Pietragallo, Bosick & Gordon lawyers had previously represented Royal, much less provide the requested documents, pleadings, correspondence and billing statements for such matters.

We have just become aware that you did, on at least 3 occasions, in fact represent Royal in workers' compensation matters, prior to your representation of Latrobe's adverse interests in the present case. These three matters are 1) *Interstate United Corp. v. Joanne Bair*; 2) *Koppers Company, Inc. v. William Boyle*; and 3) the claim of Robert Snyder.

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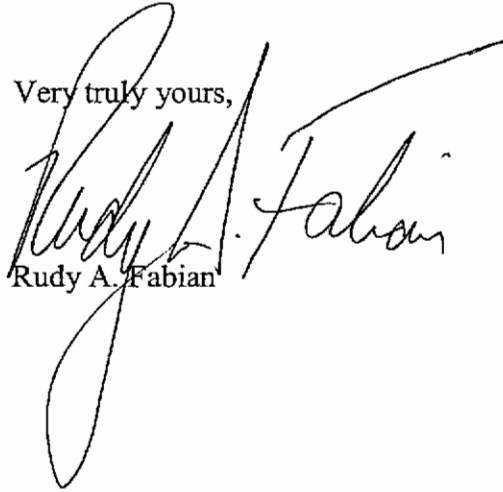
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We are very concerned about the potential conflicts of interest created by these prior representations of Royal, as well as your failure to disclose them in early 2005. Accordingly, we request that you immediately provide to us all pleadings, correspondence, billing information and all other documents associated with these three matters. We also renew our request that you promptly turn over to us all such documents regarding each and every matter in which you or any lawyer in your firm has represented Royal or any of its affiliates.

Very truly yours,

  
Rudy A. Fabian

RAF/bjc

cc: Dianne Leger  
Donna Fink